STATEMENT OF BASIS
Ruskin Company / Reliable Products Division
GENEVA, ALABAMA
Facility No. 605-S003

On May 11, 2016, the above facility, submitted their third renewal Major Source Operating Permit (MSOP) application (Title V). This facility initial MSOP was issued on November 13, 2001, and subsequently their first and second renewals were issued on November 13, 2006, and November 13, 2011, respectively. Their current MSOP have one Unit 001: with two Coating Lines S3 and S6. Ruskin Company is subject to NESHAP 40 CFR Part 63, Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. Ruskin Company has requested to maintain their existing VOC facility wide emissions limit of 235 tons per year.

OPERATION:

Ruskin Company's SIC and NAICS codes are 3444 and 332322 for sheet metal work and louvers manufacturing, and 3471 and 332813 for electroplating, plating, polishing, anodizing, and coloring, respectively.

Aluminum extrusions are received at this facility in variety of shapes. The majority of the aluminum is anodized before being cut to length. The anodizing process consists of acid cleaning, a water rinse, caustic soda etch, nitric acid de-oxidizer, sulfuric acid anodize, and hot water seal. Fumes from the caustic soda bath are pulled from the building by a fan and deflected by a duct downward into the water treatment pond just

outside the building. This facility uses two gas boilers in its anodizing process (1.4 and 0.5 MMBtu/hr boilers). The 1.4 MMBtu/hr gas boiler is used to heat the hot water seal tank, and the 0.5 MMBtu/hr gas boiler heats the caustic soda bath. After anodizing, the long, thin pieces of aluminum are cut, mitered, and assembled into louvers. This facility also has a 1000-gallon aboveground storage tank for xylene.

Ruskin Company is subject to NESHAP 40 CFR 63 Subpart MMMM for Surface Coating of Miscellaneous Metal Parts and Products. For high performance coating (architectural and industrial applications) affected source, limit organic HAP emissions to no more than 3.3 kg (27.5 lb) organic HAP per liter (gal) coating solids used during each 12-month compliance period. This facility may choose to use one compliance option for the entire affected source, or may use different compliance options for different coating operations within the affected source. "Option 1: Compliant materials, Option 2: Compliance based on the emission rate without add-on controls or Option 3: Compliance based on using a capture system and add-on control device." Ruskin Company uses the compliant material option and/or the emission rate without add-on controls option.

S3 Coating Line: This line consists of a four-stage wash process, four water curtain paint booths, and two natural gas fired ovens. The natural gas fired ovens are maintained at 350 °F and 450 °F, respectively. Paint

is applied using electrostatic spray guns to reduce overspray. The paints are applied from 55-gallon drums except for some specialty colors that are in 5-gallon containers. This line is used primarily for smaller scale louvers and has a cycle time of 1 ½ to 2 hours from start to finish.

S6 Coating Line: This line is designed to accommodate the larger louvers. This line consists of a six-stage wash, six water curtain spray booths, and two natural gas fired ovens. The last step in the wash process is the application of a zinc chromate solution, which eliminates the need for anodizing the aluminum. This line has the ability to apply a primer, topcoat, and clear coat to the pieces. Paint is applied using electrostatic spray guns and it ovens cures at 450 °F. There is a 4-hour cycle time on this line from start to finish.

EMISSIONS:

The VOC and HAP emissions are the major pollutants at this facility. This facility does not emit particulate matter (PM-10) emissions at a major source level. Ruskin Company has requested to maintain their current total facility wide VOC (including organic HAPs) emissions of 235 tons. No other criteria air pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold.

VOC / HAP Emissions:

Allowable (tpy)	Actual (tpy)
235	176.5

This is based on an operational schedule of 5,550 hours a year.

It was determined that this facility is not subject to the Part 98 Greenhouse Gas (GHG) reporting requirements. The emissions were calculated based on an annual PTE from combustion of 94 MM cubic feet of natural gas. The GHG emissions from the facility's natural gas sources are 4,465.3 and 4,482.3 metric tons for CO_2 and CO_2e respectively.

REQUIREMENT:

Ruskin Company / Reliable Products Division is in an attainment area for ozone. Ruskin Company is subject to NESHAP 40 CFR Part 63, as an existing source for Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products. There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP), New Source Performance Standards (NSPS) or Control Technology Guidelines (CTG) regulations applicable to this facility. This facility has requested to maintain their current emissions limit to avoid a PSD review.

Ruskin Company will demonstrate compliance with the Miscellaneous Metal Coating MACT by use of the recordkeeping and reporting procedures found in 40 CFR 63.3910, 40 CFR 63.3920, 40 CFR 63.3930, and 40 CFR 63.3931. Volatile organic compound emissions will also be reported to demonstrate compliance with the permit limit.

In order to demonstrate compliance with the 235 tons per year volatile organic compound limit, the facility is required to monitor their

emissions through tracking the amount of volatile organic compounds used in the process. This is found in section five of the unit specific provisos. The semi annual monitoring is consistent with the MACT. The semi-annual reports should include the compliance status as required by general provisos 21(a), and 40 CFR 63.3920(a).

Monitoring of Emissions

The VOC and HAP emissions will be determined from material usage and submitted to this Department on a quarterly basic. Ruskin Company will use the MACT compliant material option or the emission rate without add-on controls option to demonstrate compliance with Subpart MMMM. Their current monitoring is sufficient to demonstrate compliance with the existing requirements and no changes are necessary. There are no applicable CAM requirements for this facility's operations.

Permitting Fees

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

Affected States Notification

Notification of the proposal of this major source-operating permit will be sent to all affected states bordering Alabama.

RECOMMENDATION:

Based on the above analysis, I recommend renewing Ruskin Company / Reliable Products Division's existing Title V permit pending the public notice period and EPA review. The permit will consist of one Unit (001) with two lines: S3, and S6 Coating Lines.

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Clarence Fairer III
Chemical Branch
Air Division

July 12, 2016
Date

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